

✓ OKK

BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
HAWAIIAN ELECTRIC COMPANY, INC.)
For Approval of Rate Increases and)
Revised Rate Schedules and Rules, and for)
Approval and/or Modification of Demand-)
Side and Load Management Programs and)
Recovery of Program Costs and DSM Utility)
Incentives.)

DOCKET NO. 04-0113

FILED
2005 MAR 17 P 3:31
PUBLIC UTILITIES
COMMISSION

DEPARTMENT OF DEFENSE'S FIRST
SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

AND

CERTIFICATE OF SERVICE

RANDALL Y.K. YOUNG
Associate Counsel (Code 09C)
Naval Facilities Engineering Command, Pacific
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134
Telephone (808) 474-5514

ATTORNEY FOR
DEPARTMENT OF DEFENSE

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
)
HAWAIIAN ELECTRIC COMPANY, INC.)
)
For Approval of Rate Increases and)
Revised Rate Schedules and Rules, and for)
Approval and/or Modification of Demand-)
Side and Load Management Programs and)
Recovery of Program Costs and DSM Utility)
Incentives.)
)

DOCKET NO. 04-0113

DEPARTMENT OF DEFENSE'S FIRST
SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE ("Applicant") by and through their respective
attorneys, hereby submit its Submission of Information Requests to Hawaiian Electric Company, Inc.
("HECO").

DATED: Honolulu, Hawaii, March 17 2005.


RANDALL Y.K. YOUNG

Associate Counsel (Code 09C)
Naval Facilities Engineering Command, Pacific
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134
Telephone (808) 474-5514

ATTORNEY FOR
DEPARTMENT OF DEFENSE

DOCKET NO. 04-0113
DEPARTMENT OF DEFENSE'S FIRST
SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.
INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

1. For each response, HECO should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
4. Should HECO claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;

- c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and
 - d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).
5. Please provide each response in electronic format (if available) as well as paper. Please provide two copies of each response, with one copy going directly via overnight delivery to Department of Defense's consultant at the following address:

Ralph Smith
Larkin & Associates
15728 Farmington Road
Livonia, MI 48154
Fax: 734-522-1410
Email: RSmithLA@aol.com

and the other copy going directly via overnight delivery to:

Dr. Kay Davoodi
Utilities Rates and Studies Office
NAVFAC Washington
1314 Harwood Street, S.E.
Washington Navy Yard, DC 20374-5018

DEPARTMENT OF DEFENSE'S FIRST SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 04-0113

The following information requests are directed to HECO.

- DOD-IR-1 Please provide a copy of all of the data requests HECO has received from other parties to date.
- DOD-IR-2 Please provide HECO's responses to all Consumer Advocate data requests issued to date.
- DOD-IR-3 Please provide a copy of all discovery requests issued by other parties from this point forward, and also provide HECO's responses to such discovery to DOD simultaneously with when HECO provides such responses to the issuing party.
- DOD-IR-4 To the extent not filed by HECO as part of its filing or in the response to DOD-2, please provide all Excel files and supporting workpapers for HECO witness testimony T-2 through T-10, T-13 through T-22, and their exhibits.
- DOD-IR-5 Please provide 2 copies of the same 2 CDs containing HECO's work papers and 1999-2003 recorded and 2004-2005 budgeted data for labor and nonlabor costs that HECO provided to the CA as described in HECO's letter to the CA dated December 6, 2004.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing SUBMISSION OF INFORMATION REQUESTS as duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

William A. Bonnet
Vice President, Government and Community Affairs
Hawaiian Electric Company, Inc.
P.O. Box 2750
Honolulu, Hawaii 96840

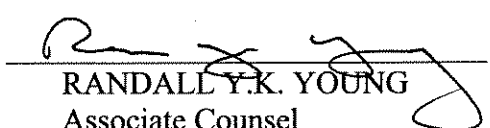
Patsy H. Nanbu
Director, Regulatory Affairs
Hawaiian Electric Company, Inc.
P.O. Box 2750
Honolulu, Hawaii 96840

Thomas W. Williams, Jr., Esq.
Peter Y. Kikuta, Esq.
Goodsill Anderson Quinn & Stifel
1800 Alii Place
1099 Alakaa Street
Honolulu, Hawaii 96813

Department of Commerce and Consumer Affairs
State of Hawaii
Division of Consumer Advocacy
335 Merchant Street, Room 326
Honolulu, Hawaii 96813

6 Copies

DATED: Honolulu, Hawaii, March 17, 2005


RANDALL Y.K. YOUNG
Associate Counsel
Naval Facilities Engineering Command,
Pacific